

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,  
MARISSA BLAIR, TYLER MAGILL, APRIL  
MUNIZ, HANNAH PEARCE, MARCUS  
MARTIN, NATALIE ROMERO, CHELSEA  
ALVARADO, and JOHN DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,  
CHRISTOPHER CANTWELL, JAMES  
ALEX FIELDS, JR., VANGUARD  
AMERICA, ANDREW ANGLIN,  
MOONBASE HOLDINGS, LLC, ROBERT  
“AZZMADOR” RAY, NATHAN DAMIGO,  
ELLIOT KLINE a/k/a/ ELI MOSLEY,  
IDENTITY EVROPA, MATTHEW  
HEIMBACH, MATTHEW PARROTT a/k/a  
DAVID MATTHEW PARROTT,  
TRADITIONALIST WORKER PARTY,  
MICHAEL HILL, MICHAEL TUBBS,  
LEAGUE OF THE SOUTH, JEFF SCHOEP,  
NATIONAL SOCIALIST MOVEMENT,  
NATIONALIST FRONT, AUGUSTUS SOL  
INVICTUS, FRATERNAL ORDER OF THE  
ALT-KNIGHTS, MICHAEL “ENOCK”  
PEINOVICH, LOYAL WHITE KNIGHTS OF  
THE KU KLUX KLAN, and EAST COAST  
KNIGHTS OF THE KU KLUX KLAN a/k/a  
EAST COAST KNIGHTS OF THE TRUE  
INVISIBLE EMPIRE,

Defendants.

**Civil Action No. 3:17-cv-00072-NKM**

**JURY TRIAL DEMANDED**

**PLAINTIFFS’ MOTION TO SEAL CERTAIN EXHIBITS TO PLAINTIFFS’ REPLY TO  
DEFENDANT SPENCER’S OPPOSITION TO MOTION FOR SANCTIONS AGAINST  
DEFENDANTS KLINE AND HEIMBACH**

On April 24, 2019, Plaintiffs filed a Reply to Defendant Spencer's Opposition to Plaintiffs' Motion for Sanctions Against Defendants Kline and Heimbach (the "Reply"). (ECF No. 475.) For the reasons set forth below, Plaintiffs hereby respectfully request that the Court enter the enclosed proposed order sealing Exhibits 1 through 9 to Plaintiffs' Reply, which were submitted conditionally under seal today in this matter.

Exhibits 1 through 9 to Plaintiffs' Reply are Defendants Spencer, Ray, Kessler, Schoep, Cantwell, Damigo, National Socialist Movement, Traditionalist Worker Party, and Identity Evropa's Responses to Plaintiffs First Interrogatories and Requests for Production of Documents. Defendants Damigo, Identity Evropa, Kessler, Ray, and Traditionalist Worker Party designated their interrogatory responses as Highly Confidential pursuant to the Order for the Production of Documents and Exchange of Confidential Information on January 3, 2018 (ECF No. 167, the "Protective Order"). Although Defendants Spencer, Schoep, and Cantwell did not designate their interrogatory responses as Highly Confidential or Confidential pursuant to the Protective Order, Plaintiffs understand this to be an inadvertent error on the part of those Defendants and have, in an abundance of caution, filed such interrogatory responses under seal. Nevertheless, Plaintiffs reserve their right to challenge all designations by Defendants.

For the reasons set forth herein, Plaintiffs request that Exhibits 1 through 9 to Plaintiffs' Reply be sealed in accordance with Local Rule 9.

Dated: April 24, 2019

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify that on April 24, 2019, I filed the foregoing with the Clerk of Court through the CM/ECF system, which will send a notice of electronic filing to:

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Jason Kessler, Vanguard America, Nathan  
Damigo, Identity Europa, Inc. (Identity  
Evropa), and Christopher Cantwell*

I further hereby certify that on April 24, 2019, I also served the following non-ECF participants, via U.S. mail, First Class and postage prepaid, addressed as follows:

Loyal White Knights of the Ku Klux Klan  
a/k/a : Loyal White Knights Church of  
the Invisible Empire, Inc.  
c/o Chris and Amanda Barker  
2634 U.S. HWY 158 E  
Yanceyville, NC 27379

Moonbase Holdings, LLC  
c/o Andrew Anglin  
P.O. Box 208  
Worthington, OH 43085

Andrew Anglin  
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East Coast Knights of the Ku Klux Klan  
a/k/a East Coast Knights of the  
True Invisible Empire  
26 South Pine St.  
Red Lion, PA 17356

Fraternal Order of the Alt-Knights  
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Daly City, CA 94015

Augustus Sol Invictus  
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I further hereby certify that on April 24, 2019, I also served the following non-ECF participants, via electronic mail, as follows:

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